

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DISCOVERORG DATA, LLC,

Plaintiff,

v.

GUIDA ADVISORY SERVICES, INC.,

Defendant.

Case No. 1:19-cv-19651-RMB- AMD

**PLAINTIFF'S NOTICE OF MOTION
FOR DEFAULT JUDGMENT AGAINST
DEFENDANT**

Electronically Filed

PLEASE TAKE NOTICE that on **July 6, 2020**, Plaintiff ZoomInfo Technologies LLC f/k/a DiscoverOrg Data, LLC ("DiscoverOrg") shall move for default judgment against Defendant Guida Advisory Services, Inc. ("Guida"), pursuant to Rule 55 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely on its accompanying redacted Memorandum of Law, redacted Declarations of Philip Watson, Jie Smith, and Darin M. Sands, Esq., and the pleadings and documents on file with the Court in this matter. After Plaintiff's motion to seal is granted by the Court, Plaintiff shall submit the unredacted versions of the aforementioned documents under seal.

PLEASE TAKE FURTHER NOTICE that a proposed judgment is submitted herewith.

FORD HARRISON LLP

s/ Mark A. Saloman

Mark A. Saloman, Esq.

300 Connell Drive, Suite 4100

Berkeley Heights, NJ 07922

Tel: 973-646-7300

msaloman@fordharrison.com

Darin M. Sands, Esq., *Admitted Pro Hac Vice*

LANE POWELL PC

601 SW Second Avenue, Suite 2100

Portland, Oregon 97204-3158

Telephone: 503.778.2100

Email: sandsd@lanepowell.com

Attorneys for Plaintiff *DiscoverOrg Data, LLC*

CERTIFICATE OF SERVICE

I hereby certify that the within Notice of Motion and supporting documents was electronically filed with the Clerk within the time and in the manner prescribed by the Federal Rules of Civil Procedure and Local Rules and that a copy of the within pleading has been served this date upon the Defendant, who has not entered an appearance in this case, by electronic delivery to its counsel:

Mark Halderman, Esq.
Ted Behm, Esq.
Armstrong Teasdale LLP
2005 Market Street, 29th Floor
One Commerce Square
Philadelphia, Pennsylvania 19103
Counsel for Defendant *Guida Advisory Services, Inc.*

Dated: June 12, 2020

By: /s/ Mark A. Saloman
Mark A. Saloman

WSACTIVE LLP:11564144.1